

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS**

JAY CONNOR, individually and on behalf
all others similarly situated.

Plaintiff,

v.

DRIVESMART AUTO CARE, INC. and
DIGIDEV LLC d/b/a TRISEC WARRANTY

Defendants.

)
)
)
)
)
)
)
)
)
)

Case No. 1:24-cv-08413

Honorable John H. Lefkow

**SECOND UNOPPOSED MOTION OF DEFENDANT
DRIVESMART AUTO CARE INC TO EXTEND
TIME TO RESPOND TO COMPLAINT**

Defendant DRIVESMART AUTO CARE, INC. (“DriveSmart”), by and through its attorneys, The Law Office of Marc Jonas Block, PC, and Plaintiff JAY CONNOR, by and through his attorneys, Paronich Law P.C., jointly move this Court for extension of time for defendant DriveSmart to Answer or otherwise respond to the complaint in the current action to December 13, 2024, and jointly state as follows:

In support of this Stipulation, the parties certify to the Court as follows:

1. Plaintiff filed its Complaint in this Court on September 13 2024.
2. DriveSmart was served with the Summons and Complaint on October 1, 2024.
3. DriveSmart response to Plaintiff’s Complaint was initially due on or about October 22, 2024.
4. DriveSmart requested additional time to file an answer, to which the Plaintiff did not object. The response deadline was extended to November 22, 2024. Thus, the time within which DriveSmart must file its responsive pleading has not yet expired.

5. The parties are discussing settlement options, and request an additional twenty-one (21) days to file a responsive pleading.

5. Plaintiff's counsel has stipulated to this extension of twenty-one (21) days, up to and including **December 13, 2024**, in which DriveSmart must file its response to Plaintiff's Complaint.

6. This is the second request for an extension of time filed by DriveSmart.

7. DriveSmart does not anticipate the need for any additional extension of time beyond that requested. In fact, Digidev has scheduled the 26(f) conference with Plaintiff for November 27, 2024. This conference will take place, unless the parties enter into a settlement prior to the date.

8. Upon filing this Motion with the court, a copy will be provided to counsel for all parties digitally.

WHEREFORE, the Defendant, DriveSmart, respectfully prays that this court extend the time for Digidev to respond to Plaintiff's Complaint to December 13, 2024.

WHEREFORE, the parties further request that the In Person Status Hearing, currently scheduled for December 4, 2024, be extended to a date convenient for the Court after December 13, 2024.

Date: November 21, 2024

 *JAY CONNOR, Plaintiff*

Anthony Paronich
PARONICHLAW, P.C.
350 Lincoln Street, Suite 2400
Hingham, MA 02043
Email: anthony@paronichlaw.com
Telephone: (617) 485-0018
Facsimile: (508) 318-8100

DRIVESMART AUTO CARE, INC., Defendant.

 *Marc Block*

Marc Jonas Block (MB1850)
THE LAW OFFICES OF MARC JONAS BLOCK PC
42 Broadway, 22nd Floor
New York, New York 10004
Email: mblock@mjblocklaw.com
Telephone: (646) 821-6886
Facsimile: (212) 602-0077